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U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 21, 2021

MEMO ENDORSED

VIA ECF

Hon. Valerie E. Caproni
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Belem, et al. v. Renaud, et al.*, No. 21 Civ. 4093 (VEC)

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their Petition for Alien Relative (Form I-130) and Application to Register Permanent Residence or to Adjust Status (Form I-485). As the government was served with the complaint by mail on May 21, 2021, its response to the complaint currently is due on July 23, 2021. On behalf of both sides, I write respectfully to request that the initial conference presently scheduled for June 25, 2021 be adjourned *sine die* or, alternatively, to the week of August 2, 2021, or thereafter.

The parties respectfully request adjournment of the initial conference because the USCIS New York Field Office is in the process of obtaining the necessary files in order to determine next steps in this case, which may include adjudication of the Form I-130 and Form I-485 or further action such as the issuance of Request for Evidence or the scheduling of an interview. The government anticipates that adjourning the conference until after the time provided in the Federal Rules of Civil Procedure for its response to the complaint will allow it to be in a better position to determine the necessary next steps in the adjudication process and the timeline therefor. The parties thus jointly request that they be permitted to submit an appropriate letter on or before July 21, 2021, proposing next steps in this case, which may include a request for an appropriate extension of the government's time to respond to the complaint or a request for a conference. Alternatively, the parties request that the Court adjourn the June 25 conference until the week of August 2, 2021, or thereafter. The parties respectfully submit that the requested adjournment is in the interests of judicial efficiency and conservation of judicial and party resources.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: Counsel of record (via ECF)

The initial pre-trial conference, currently scheduled for Friday, June 25, 2021 at 12:00 P.M., is hereby adjourned to **Friday, August 6, 2021 at 11:00 A.M.** The parties' joint pre-conference submission is due no later than **Wednesday, July 21, 2021.** The submission must address the topics listed in the Court's May 11, 2021 Order (Dkt. 16) and include a proposal for next steps in this matter.

All parties and any interested members of the public must attend by dialing 1-888-363-4749, using the access code 3121171, and the security code 4093. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak. Recording or rebroadcasting the proceeding is strictly prohibited by law.

SO ORDERED.



Date: June 22, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE